

USDS SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 4/18/12

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

THE EXPORT-IMPORT BANK OF THE : 06-CV-2469 (HB)(AJP)  
REPUBLIC OF CHINA, :

**Judgment Creditor,**

- against -

## **GRENADA,**

**STIPULATION AMENDING  
BRIEFING SCHEDULE**

**Judgment Debtor.**

GRENADA,  
Judgment Debtor.

WHEREAS, on March 20, 2012, Defendant and Judgment Debtor, The Government of Grenada ("Grenada"), and Interested Third Parties, the Grenada Airports Authority, Aviation Services of Grenada LTD., the Grenada Ports Authority, the National Water and Sewage Authority of Grenada, and the Grenada Solid Waste Management Authority (each a "Statutory Corporation" and collectively, the "Statutory Corporations") submitted to this Court a Joint ("Joint Motion"), seeking an order vacating certain restraining notices issued pursuant to N.Y.C.P.L.R. § 5222 and for such other and further relief as the Court may deem proper.

WHEREAS, on April 3, 2012, Plaintiff and Judgment Creditor, The Export Import Bank of the Republic of China ("Ex-Im Bank") filed an opposition to the motion and a cross motion seeking an order for additional discovery and the turnover to Ex-Im Bank of certain restrained funds.

WHEREAS the parties have agreed to extend the deadline for Grenada and the Statutory Corporations to file a reply brief and opposition to the cross-motion to April 17, 2012.

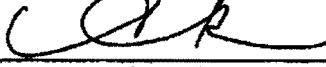
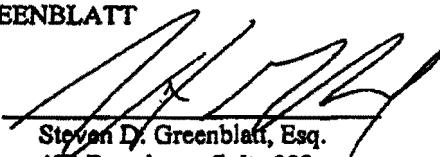
WHEREAS the parties have agreed to extend the deadline for Ex-Im Bank to file a reply brief on its cross-motion to May 1, 2012.

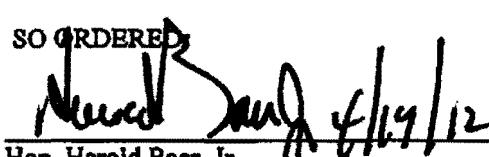
**IT IS HEREBY STIPULATED AND ORDERED that**

- 1. Pursuant to this Stipulation, Grenada and the Statutory Corporations shall file their reply brief on their motion and opposition to the cross-motion on or before April 17, 2012.**
- 2. Pursuant to this Stipulation, Ex-Im Bank shall file its reply brief on or before May 1, 2012.**

Respectfully submitted:

Dated: New York, New York  
April 11, 2012

<p>SULLIVAN &amp; WORCESTER LLP</p> <p></p> <p>By: _____</p> <p>Paul E. Summit, Esq. Andrew T. Solomon, Esq. Courtney Evanchuk, Esq. 1290 Avenue of the Americas, 29<sup>th</sup> Floor New York, New York 10104 (212) 660-3023 (tel) (212) 660-3001 (fax) <a href="mailto:psummit@sandw.com">psummit@sandw.com</a> <a href="mailto:asolomon@sandw.com">asolomon@sandw.com</a></p> <p><i>Attorneys for Judgment Creditor The Export-Import Bank of the Republic of China</i></p> <p>THE LAW OFFICE OF STEVEN D. GREENBLATT</p> <p></p> <p>By: _____</p> <p>Steven D. Greenblatt, Esq. 480 Broadway, Suite 328 Saratoga Springs, New York 12866 (518) 82401254 (tel) (518) 824-5704 (fax) <a href="mailto:sgreenblatt@sdgesq.com">sgreenblatt@sdgesq.com</a></p> <p><i>Attorney for the Statutory Corporations</i></p>	<p>FRANKFURT KURNIT KLEIN &amp; SELZ, PC</p> <p></p> <p>By: _____</p> <p>Brian E. Maas, Esq. 488 Madison Avenue New York, New York 10022 (212) 980-0120 (tel) (212) 593-9175 (fax) <a href="mailto:bmaas@fks.com">bmaas@fks.com</a></p> <p><i>Attorneys for Judgment Debtor Grenada</i></p>
---	---

SO ORDERED  
  
Hon. Harold Baer, Jr.  
United States District Judge